



Tekify Broadband Internet Services
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Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

*Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed
National Information Infrastructure (U-NII) Devices in the 5 GHz Band
ET Docket No. 13-49*

Comments in Support of Petition for Reconsideration of WISPA, Cambium, Mimosa Networks and JAB

Dear Ms. Dortch,

Thank you for the recent changes to the 5150-5250MHz band. These changes will allow our company to use this band for outdoor long distance PTP and short distance PTMP networks, which will help alleviate existing spectrum congestion found primarily in the U-NII-3 band.

Tekify Broadband is a high-speed wireless internet service provider (WISP) located in the San Francisco Bay Area, California. We provide an alternative option for many business and residential customers who are underserved, or not served, by the existing Comcast/AT&T duopoly. We rely exclusively on 5GHz unlicensed frequencies to serve our customers, so this First R&O directly affects us.

We are writing this letter in support of WISPA, Cambium Networks, Mimosa Networks, and JAB Wireless' filings regarding the FCC's Out-of-Band Emissions decisions as described in the First Report and Order, ET Docket Number 13-49, paragraphs 114 through 120.

We believe that the FCC's adoption of the more stringent requirements found in 15.407 will unnecessarily burden users of the U-NII-3 band, including WISPs like us. The more stringent requirement will limit the frequency range that a device can tune its radio to and significantly increase the sale price of equipment (if additional hardware filtering is used to mitigate OOB emissions), decrease the usable spectrum from the current 125MHz to less than half (if channel spacing from the band edge is used to mitigate OOB emissions), or artificially limit the distances our networks can serve (if a reduced antenna gain and/or EIRP is used to mitigate OOB emissions).

It is our belief that this limitation is not consistent with the FCC's goal, as described in paragraph 112. The FCC states that its intention is not to reduce the capabilities of equipment previously certified under either 15.247 or 15.407. Adopting the more stringent requirements from section 15.407 will do exactly that. Existing equipment certified under the more lenient section 15.247 will not necessarily conform to the more stringent requirements of section 15.407, and therefore will likely be severely impacted by this decision.

Please adopt the out-of-band emissions limits found in section 15.247 instead of those found in section 15.407.

Sincerely,

Brett Woollum 7/3/2014

Brett Woollum, Founder and CEO

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